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PORT OF PORTLAND

January 25, 2006

Mr. Tom Gainer
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

**Subject: Terminal 5 Upland Facility
Transmittal of Groundwater Monitoring Report and
Request for No Further Action
ECSI No. 1686**

Dear Tom:

Enclosed please find two copies of the Groundwater Monitoring Report December 2005 for the Terminal 5 Upland Facility (Facility) in Portland, Oregon. The groundwater monitoring and enclosed report of results were conducted in response to a letter from the Oregon Department of Environmental Quality (DEQ) to the Port of Portland (Port) dated March 14, 2005. As detailed in the enclosed report, the recent results are consistent with previous assessments and support that groundwater in the vicinity of the former Blue Lagoon does not represent a potential source to the river so no further action regarding this issue is needed. With the submittal of the enclosed report and the previously submitted Contaminated Area and Media Management Plan (CAAMMP) – which we are revising in light of your January 17, 2006 comments – all outstanding issues identified by DEQ have been resolved.

A No Further Action determination is supported for the Terminal 5 Upland Facility, based on the following:

1. The Port submitted a Preliminary Assessment (PA) to DEQ on September 7, 2000 in response to a request made by DEQ in a letter to the Port dated December 16, 1999. The PA documented facility history, operations, previous site investigations and results and reported spills and related cleanup.
2. DEQ provided comments on the PA to the Port in a letter dated May 15, 2001. In the May 15, 2001 letter, DEQ concluded that, based on a review of sediment data, site operations and information on historical spills contained in the PA, there did not appear to be significant sediment contamination adjacent to the subject site related to site activities. However, DEQ requested information on seven items to complete its evaluation for determining whether a "no further action" letter could be issued for the Facility.
3. The Port provided information on six of the seven items in a letter to DEQ dated August 31, 2001. In summary:

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- A review of available and pertinent records and search of the site was conducted but a reported 1982 groundwater well installed by Riedel could not be located (and still has not been able to be located).
 - Groundwater flow in the southern portion of the Facility was estimated to flow to the west and south-southwest based on groundwater level measurements collected during eleven monitoring events and the flow direction did not appear to be seasonally affected.
 - Further documentation was provided regarding the cleanup of three areas of surficially stained soil that now lie below the Alcatel facility.
 - Waste management practices for the Alcatel facility were described.
 - Waste management practices for the Columbia Grain operations were described.
 - Further information on a June 10, 1993 spill response by Norton Lilly was provided.
4. In the March 14, 2005 letter, DEQ noted two issues (one remaining from the May 15, 2001 comment letter and one new issue) requiring resolution prior to issuance of a DEQ determination of No Further Action at the Facility. These two issues were:
- a. Confirmation of groundwater quality in the vicinity of the former Blue Lagoon to allow DEQ to evaluate the potential groundwater migration pathway and complete the Portland Harbor upland source control determination for the subject site. Specifically, the March 14, 2005 letter notes that barium, iron, and manganese concentrations in groundwater had exceeded DEQ Level II Ecological Screening Level Values (SLVs) during previous sampling, and, because groundwater had not been sampled for six years, a current understanding of these constituent concentrations and groundwater flow directions would be needed to complete the DEQ evaluation.
 - b. Management of buried Blue Lagoon residual sediment would be needed to protect current and future potential human and ecological exposures.

To address the second issue, the Port submitted a draft Contaminated Area and Media Management Plan (CAAMMP) to the DEQ on January 9, 2006. The Port will shortly be submitting a revised CAAMMP addressing DEQ's comments of January 17, 2006. To resolve the first issue, the Port completed the additional monitoring documented in the enclosed groundwater monitoring report.

5. As stated above, the barium, iron, and manganese concentrations are consistent with previous results and are lower than previous maximum concentrations. The groundwater flow direction was measured to the south and west-southwest. The estimated west-southwest gradient (i.e., toward the river) is approximately 0.02, supporting an average groundwater velocity on the order of 30 feet per year. The former lagoon is approximately 1,200 feet from the river so the estimated travel time for groundwater from the former lagoon area to reach the river would be approximately 40 years.

These and the previous results together support that the groundwater quality in the area of the former Blue Lagoon has only been minimally impacted (if at all) from the presence of the buried material. Based on the estimated groundwater velocity, the considerable distance of the lagoon to the river, and the low concentrations of iron, barium, and manganese, it is unlikely that these constituents could reach the river or river sediments, and very unlikely so to do at concentrations of concern.

We look forward to your review of the enclosed document and receipt of a No Further Action determination for the Facility.

Please call me at (503) 944-7323 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nicole Anderson". The signature is fluid and cursive, with the first name "Nicole" and last name "Anderson" clearly distinguishable.

Nicole Anderson
Environmental Program Manager

Enclosure

c: David Ashton, Port of Portland
David Breen, Port of Portland
Anne Summers, Port of Portland
Bob Teeter, Port of Portland
Amanda Spencer, Ash Creek Associates